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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA.

Plaintiff,

V.

LISA ZAVIEH, individually, as the successor-in-interest to Amir Zavieh, and as the distributee of the Estate of Amir Zavieh, a/k/a Allen Zavieh,

Defendants.

Case No. 4:17-cv-3286-KAW

**STIPULATION AND [PROPOSED]
ORDER TO ENLARGE NON-
EXPERT DISCOVERY DEADLINE**

The United States of America and Lisa Zavieh, by and through undersigned counsel, hereby stipulate and request that the non-expert discovery deadline currently scheduled for July 6, 2018 be enlarged to August 6, 2018, and state as follows:

1. On January 25, 2018, the Court entered a Case Management and Pretrial Order for Bench Trial (Docket No. 46).

1 2. Per the Court's Order, non-expert discovery shall be completed by July 6, 2018
2 and expert discovery shall be completed by August 6, 2018 (Docket No. 46).

3 3. The United States believes that it will be necessary to depose Martin Lack, who
4 advised Amir Zavieh regarding his Swiss bank account. Mr. Lack currently resides abroad, but is
5 willing to voluntarily appear for a deposition to be taken in Washington, D.C.

6 4. To accommodate Mr. Lack and counsel for Ms. Zavieh's travel schedules, the
7 United States requests that the non-expert discovery deadline be extended to August 6, 2018.

8 5. Undersigned counsel for the United States has conferred with undersigned
9 counsel for Ms. Zavieh and Ms. Zavieh agrees to this request.

10 6. This is the parties' first stipulation for an extension of the non-expert discovery
11 deadline.

12 7. This request will not affect the schedule for the case.

13 WHEREFORE, the Parties hereby stipulate and request to enlarge the non-expert
14 discovery deadline to August 6, 2018.

15 Respectfully submitted this 14th day of February, 2018.

16 RICHARD E. ZUCKERMAN
17 Principal Deputy Assistant Attorney General

SIDEMAN & BANCROFT LLP

18 /s/ Yael Bortnick
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18 /s/ Jay R. Weill
19 JAY R. WEILL
20 *Attorneys for Lisa Zavieh*

24 BRIAN STRETCH
25 United States Attorney
26 *Of Counsel*

[PROPOSED] ORDER

PURSUANT TO STIPULATION, and for good cause shown, IT IS HEREBY ORDERED that the non-expert discovery deadline is enlarged to August 6, 2018.

SO ORDERED this 20th day of February, 2018.

Kandis Westmore
HON. KANDIS A. WESTMORE
United States Magistrate Judge